



Fw: related to my voice mail
Philip Dellinger to: Nancy Dorsey

12/18/2012 12:58 PM

From: Philip Dellinger/R6/USEPA/US
To: Nancy Dorsey/R6/USEPA/US@EPA,

This the version we used, right?

----- Forwarded by Philip Dellinger/R6/USEPA/US on 12/18/2012 12:57 PM -----

From: Ronald Bergman/DC/USEPA/US
To: Philip Dellinger/R6/USEPA/US@EPA
Date: 12/17/2012 12:43 PM
Subject: related to my voice mail

Hi Phil,

Here's the language I referenced in my voice mail. The language in red is for the response to Oklahoma.

----- Forwarded by Ronald Bergman/DC/USEPA/US on 12/17/2012 01:41 PM -----

From: Ronald Bergman/DC/USEPA/US
To: Stacey Dwyer/R6/USEPA/US@EPA
Date: 12/17/2012 10:23 AM
Subject: language

Hi Stacey,

I left you a message on this. Can you let me know if this works for you?

Thank you for sending us the draft of your response to Oklahoma on the Class I permit. We support the professional judgement of the Region 6 staff on this issue and the recommendations to Oklahoma, especially around the potential for seismic activity. The data you have sent gives us concern about potential induced seismicity, given the fractures in the area and the history of seismic activity. Given the importance of protecting against injection-induced seismic events, we recommend that the letter place greater emphasis on this concern. In addition to public safety issues, earthquakes can result in contamination of ground water resources. The concern should be mentioned more prominently in the introduction and also highlighted in the relevant technical recommendations. The recommendations should identify more clearly which ones are designed to help minimize the potential to induce seismicity and could also provide information about how the action would improve protection.

Suggestion for the opening paragraph:

"We have completed our technical review of the injection well Operating Permit Application for Midway Environmental Services. Several significant concerns were identified and recommendations developed based on this review. In particular, given recent seismic activity in the regional area of the proposed well we think it is very important that precautions be taken to minimize the potential to induce seismicity. This potential is dependent on a combination of site geology, geophysical and reservoir characteristics and, while no single recommendation addresses all of the complexities related to injection-induced seismicity, we recommend several additions to the permit application to enhance site assessment and contingency planning. In addition to these items, we recommend additional actions to the permit application to address questions about the actual injection interval and area of review (AoR) reliability. Specific

comments and recommendations are outlined below."